

[Submitting Counsel on Signature Page]

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

People of the State of California, et al.  
v.  
Meta Platforms, Inc., Instagram, LLC, Meta  
Payments, Inc., Meta Platforms Technologies,  
LLC

Office of the Attorney General, State of Florida,  
Department of Legal Affairs  
v.  
Meta Platforms, Inc., Instagram, LLC., Meta  
Payments, Inc.

State of Montana, *ex rel.* Austin Knudsen,  
Attorney General  
v.  
Meta Platforms, Inc., Instagram, LLC, Facebook  
Holdings, LLC, Facebook Operations, LLC,  
Meta Payments, Inc., Meta Platforms  
Technologies, LLC, Siculus, Inc.

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:  
4:22-md-03047-YGR; 4:23-cv-05448; 4:23-cv-  
05885; 4:24-cv-00805

MDL No. 3047

Case No. 4:22-md-03047-YGR  
4:23-cv-05448-YGR  
4:23-cv-05885-YGR  
4:24-cv-00805-YGR

**STATE ATTORNEYS GENERAL'S  
OPPOSED ADMINISTRATIVE MOTION  
FOR STAY**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil L.R. 7-11, the State Attorneys General (AGs) move this Court to stay its order granting in part and denying in part Meta’s request for party discovery, Doc. 1117, pending review by Judge Gonzalez Rogers. This Motion is filed contemporaneously with the AGs’ Rule 72 objections to the discovery order (“AGs Objections”), filed as a Motion for Relief.

A magistrate judge may issue a stay under their inherent authority to stay their own order pending a challenge. *See PlayUp, Inc. v. Mintas*, 635 F. Supp. 3d 1087, 1094 (D. Nev. 2022) (citing *Nken v. Holder*, 556 U.S. 418, 426 (2009)). In considering whether to stay a magistrate judge’s order pending Rule 72 objections, courts typically apply the same four-factor test used for a stay pending appeal. *Id.* (citation omitted). That test is: (1) whether the stay applicant has made a strong showing of likely success on the merits; (2) whether the applicant will be irreparably injured absent a stay; (3) whether issuance of the stay will substantially injure the other parties interested in the proceeding; and (4) where the public interest lies. *Duncan v. Bonta*, 83 F.4th 803, 805 (9th Cir. 2023) (quoting *Nken*, 556 U.S. at 425–26).

The Ninth Circuit uses a sliding scale approach by which a stronger showing on one element can offset a weaker showing of another. *Al Otro Lado v. Wolf*, 952 F.3d 999, 1007 (9th Cir. 2020) (citation omitted). The “relative hardships to the parties” provide the “critical element” in determining at what point on the continuum a stay pending review is justified. *Leiva-Perez v. Holder*, 640 F.3d 962, 970 (9th Cir. 2011) (citation omitted). The party requesting the stay bears the burden of demonstrating one is warranted. *Al Otro Lado*, 952 F.3d at 1006.

#### **A. The AGs are likely to succeed on the merits.**

To obtain a stay, a movant need only demonstrate that its appeal has a “reasonable probability” or “fair prospect” of success. *Leiva-Perez*, 640 F.3d at 967 (citation omitted). The movant need not show “that it is more likely than not that [it] will win on the merits.” *Id.* at 966. Alternatively, a movant can show that its appeal raises “serious” legal questions if the “balance of hardships tips sharply in its favor.” *Golden Gate Rest. Ass’n v. City & Cnty. of San Francisco*, 512 F.3d 1112, 1116 (9th Cir. 2008). In this district, a “serious legal question” generally includes (1) a matter of first impression within the Ninth Circuit, (2) a constitutional question, or (3) a pressing legal issue which urges the Ninth Circuit to hear the case. *See e.g., Yeomans v. World*

1 *Fin. Grp. Ins. Agency, Inc.*, No. 19-CV-00792-EMC, 2021 WL 1772808, at \*3 (N.D. Cal. Mar.  
 2 19, 2021) (quoting *Stiner v. Brookdale Senior Living, Inc.*, 383 F. Supp. 3d 949, 953-54 (N.D.  
 3 Cal. 2019)).

4 The AGs' Objections satisfy this test under any analysis. *First*, the AG's objection meets  
 5 the "fair prospect" test on both issues presented: (1) that control of all state agencies cannot be  
 6 imputed to a state AG discharging their independent law enforcement function, and (2) that the  
 7 attorney-client relationship, if it did exist, does not provide attorneys the right to obtain and  
 8 produce documents on demand from their client. For the reasons fully articulated in the AG's  
 9 Objections, the AGs have a "fair prospect" of persuading Judge Gonzalez Rogers that the order  
 10 misapprehends the role of AGs acting as counsel to independent state agencies, misapplies  
 11 controlling Ninth Circuit authority in shifting the burden to the AGs to demonstrate their lack of  
 12 control, and disregards the structure of state governments and the substantial federal authority  
 13 respecting states' sovereign structures. Moreover, the order incorrectly holds that attorneys have  
 14 the legal right to obtain documents from clients, even to respond to discovery requests served in a  
 15 case to which the clients are not party.

16 *Second*, the issues raised in the AGs' Objections are unequivocally "serious legal  
 17 questions." The Court's discovery order holding that the executive agencies of thirty-five  
 18 different states are subject to party discovery in this law enforcement action brought by the AGs  
 19 creates an issue of first impression in this Circuit. *See Maxcrest Ltd. v. United States*, No. 15-MC-  
 20 80270-JST, 2016 WL 6599463, at \*2 (N.D. Cal. Nov. 7, 2016) (granting stay pending appeal on  
 21 novel issue of first impression in the Ninth Circuit)).

22 *Third*, the AGs' Objections raise constitutional questions. The Court's order obligates  
 23 State AGs to exercise a form of control over the records of state agencies that they lack under the  
 24 divided executive structure of state constitutions. This violates the federalism principles at the  
 25 heart of our federal constitutional system. *See, e.g., Gregory v. Ashcroft*, 501 U.S. 452, 460  
 26 (1991) ("Through the structure of its government, and the character of those who exercise  
 27 government authority, a State defines itself as a sovereign.").

**B. A stay is necessary to avoid irreparable injury.**

A movant must show that irreparable injury is “likely to occur” during the period before the appeal is likely to be decided. *Al Otro Lado*, 952 F.3d at 1007 (citation omitted). The AGs more than meet that standard. *First*, the discovery order is apt to create conflicts between the AGs and state executive agencies. If allowed to stand, the order places the AGs in the impossible position of responding to discovery seeking documents to which they have no legal right to access, significantly impedes the functioning of state government, and imperils the ability of state AGs to bring enforcement actions in federal court.

*Second*, the burden imposed by Meta’s sweeping discovery request is substantial: 275 agencies are the target of discovery and Meta has represented it plans to take between 70-165 depositions, depending on the ruling in this dispute. Doc. 1109, pp. 6-10, 7 n.5; Doc. 736-1, p. 32. And Meta seeks to impose this burden immediately while the Court considers the AGs’ objections. Meta maintains that the consumer protection attorneys prosecuting this action bear the responsibility for coordinating substantial discovery. And, more puzzlingly, Meta suggests that the conferrals already underway with state agencies regarding Rule 45 subpoenas and potentially productions made in response to those subpoenas, are not to be considered in determining what information Meta actually seeks with its requests from the agencies.

*Third*, if the AGs have to divert their attention to these extremely heavy and contested discovery obligations, progress on other critical and undisputed discovery tasks will be delayed, making it uncertain whether this enforcement action, aimed at protecting the most vulnerable of our citizens, can remain on track. This will delay relief for youth and consumers in 35 states who the State AGs allege suffered and continue to suffer mental and physical health harms as a result of Meta’s deceptive and unfair business practices.

**C. Meta will suffer minimal harm should the Court stay the order.**

On the other hand, should the Court stay its order, Meta will suffer little harm. At issue is discovery Meta sought through one means (Rule 34 discovery); meanwhile Meta has sought and received such discovery through other means by issuing over 140 Rule 45 subpoenas to state agencies. Doc. 1120, pp. 13-14; Doc. 1110, pp. 2-8. A stay of the discovery order pending the

AGs’ Objections would not halt Meta’s discovery of the state agencies which is already underway through voluminous Rule 45 subpoenas. Thus, “a stay pending appeal will not prejudice [Meta’s] ability to conduct discovery” and defend against this action. *Pokorny v. Quixtar Inc.*, No. 07-00201 SC, 2008 WL 1787111, at \*2 (N.D. Cal. Apr. 17, 2008).

And Meta’s claim of injury from any brief stay while the District Court considers the AGs Objections falls flat. Meta delayed in seeking targeted agency discovery through subpoenas for nearly six months during the pendency of this dispute, despite this Court repeatedly pointing out to Meta that it was making a tactical choice not to issue subpoenas during the pendency of the dispute, even to the subset of agencies from which it most wanted information. TR 2/22/24 (Doc. 663, p. 37:8-23; TR 4/22/24 (Doc. 782), pp. 7:20-9:7; TR 5/6/24 (Doc. 822), pp. 101:4-15, 103:9-25, 104:6-9; Doc. 1031.

#### **D. The public interest weighs heavily in favor of a stay.**

The public has a strong interest in the just and efficient vindication of the rights and protections afforded by consumer protection laws, as well as in the proper functioning of state government. *See Golden Gate Rest. Ass’n*, 512 F.3d at 1127 (“The public interest may be declared in the form of a statute.” (quoting 11A Charles Alan Wright, Arthur R. Miller & Mary Kay Kane, *Federal Practice and Procedure* § 2948.4, at 207 (2d ed. 1995))). The order hampers this enforcement action, risks disrupting the relationships of independent state entities, and, in the future, imperils states’ ability to pursue affirmative enforcement actions on behalf of the public and consumers in federal court.

Finally, the principles of federalism weigh in favor of a stay. Given that the order held that Rule 34 is governed only by federal law even where state law might limit control or disclosure, Doc. 1117, p.9, a stay while the state AGs object on state law grounds respects federalism and state sovereignty.

#### **E. Conclusion**

For all these reasons, the state AGs ask this Court to stay its Order, Doc. 1117, pending adjudication of their Motion for Relief.

Dated: September 20, 2024

Respectfully submitted,

**KRIS MAYES**  
Attorney General  
State of Arizona

**ROB BONTA**  
Attorney General  
State of California

/s/ Laura Dilweg  
Laura Dilweg (AZ No. 036066, CA No. 260663)  
Chief Counsel - Consumer Protection and  
Advocacy Section  
Nathan Whelihan (AZ No. 037560, CA No.  
293684), *pro hac vice*  
Assistant Attorney General  
Arizona Attorney General's Office  
2005 North Central Avenue  
Phoenix, AZ 85004  
Phone: (602) 542-3725  
Fax: (602) 542-4377  
Laura.Dilweg@azag.gov  
Nathan.Whelihan@azag.gov

/s/ Megan O'Neill  
Nicklas A. Akers (CA SBN 211222)  
Senior Assistant Attorney General  
Bernard Eskandari (CA SBN 244395)  
Emily Kalanithi (SBN 256972)  
Supervising Deputy Attorneys General  
Nayha Arora (CA SBN 350467)  
Megan O'Neill (CA SBN 343535)  
Joshua Olszewski-Jubelirer  
(CA SBN 336428)  
Marissa Roy (CA SBN 318773)  
Brendan Ruddy (CA SBN 297896)  
Deputy Attorneys General  
California Department of Justice  
Office of the Attorney General  
455 Golden Gate Ave., Suite 11000  
San Francisco, CA 94102-7004  
Phone: (415) 510-4400  
Fax: (415) 703-5480  
megan.oneill@doj.ca.gov

*Attorneys for Plaintiff State of Arizona*

**PHILIP J. WEISER**  
Attorney General  
State of Colorado

*Attorneys for Plaintiff the People of the State  
of California*

/s/ Bianca E. Miyata  
Bianca E. Miyata (CO Reg. No. 42012),  
*pro hac vice*  
Senior Assistant Attorney General  
Lauren M. Dickey (CO Reg. No. 45773)  
First Assistant Attorney General  
Elizabeth Orem (CO Reg. No. 58309)  
Assistant Attorney General  
Colorado Department of Law  
Ralph L. Carr Judicial Center  
Consumer Protection Section  
1300 Broadway, 7<sup>th</sup> Floor  
Denver, CO 80203  
Phone: (720) 508-6651  
bianca.miyata@coag.gov

*Attorneys for Plaintiff State of Colorado, ex rel.  
Philip J. Weiser, Attorney General*

**WILLIAM TONG**  
Attorney General  
State of Connecticut

/s/ Lauren H. Bidra

Lauren H. Bidra  
(CT Juris No. 440552), *pro hac vice*  
Special Counsel for Media and Technology  
Krislyn M. Launer  
(CT Juris No. 440789), *pro hac vice*  
Assistant Attorney General  
Connecticut Office of the Attorney General  
165 Capitol Avenue  
Hartford, Connecticut 06106  
Phone: 860-808-5306  
Fax: 860-808-5593  
Lauren.Bidra@ct.gov  
Krislyn.Launer@ct.gov

*Attorneys for Plaintiff State of Connecticut*

**KATHLEEN JENNINGS**  
Attorney General  
State of Delaware

/s/ Marion M. Quirk

Owen Lefkon  
Director of Fraud and Consumer Protection  
Marion Quirk, *pro hac vice*  
Director of Consumer Protection  
Ryan T. Costa (DE Bar 5325), *pro hac vice*  
Deputy Director of Consumer Protection  
Deputy's Attorney General  
Delaware Department of Justice  
820 N. French Street, 5th Floor  
Wilmington, DE 19801  
Phone: (302) 683-8800  
Marion.Quirk@delaware.gov

*Attorneys for Plaintiff State of Delaware*

**ASHLEY MOODY**  
Attorney General  
State of Florida

/s/ Victoria Ann Butler

Victoria Ann Butler (FL Bar No. 861250),  
*pro hac vice*  
Director of Consumer Protection Litigation  
3507 E. Frontage Road, Suite 325  
Tampa, FL 33607  
Telephone: (813) 287-7950  
Victoria.butler@myfloridalegal.com

John M. Guard (FL Bar No. 374600),  
*pro hac vice*  
Chief Deputy Attorney General  
PL-01 The Capitol  
Tallahassee, FL 32399  
John.guard@myfloridalegal.com

Nicholas J. Weilhammer (FL Bar No. 479322),  
*pro hac vice*  
Associate Deputy Attorney General for  
Enforcement  
PL-01 The Capitol  
Tallahassee, FL 32399  
Telephone: (850) 414-3861  
Nicholas.weilhammer@myfloridalegal.com

Donna Cecilia Valin (FL Bar No. 96687),  
*pro hac vice*  
Special Counsel, Assistant Attorney General  
135 West Central Blvd.  
Orlando, FL 32801  
Telephone: (407) 316-4840  
Donna.valin@myfloridalegal.com

Karen E. Berger (FL Bar No. 72991)  
*pro hac vice*  
Special Counsel, Assistant Attorney General  
110 SE 6th Street, 10th Floor  
Fort Lauderdale, FL 33301  
Telephone: (954) 712-4600  
Karen.berger@myfloridalegal.com

*Attorneys for Office of the Attorney General,  
State of Florida, Department of Legal Affairs*



**CHRISTOPHER M. CARR**

Attorney General  
State of Georgia

/s/ Melissa M. Devine

Melissa M. Devine (GA Bar No. 403670),  
*pro hac vice*  
Assistant Attorney General  
Office of the Attorney General of the State of  
Georgia  
2 Martin Luther King Jr. Drive, SE, Ste. 356  
Atlanta, GA 30334  
Phone: (404) 458-3765  
Fax: (404) 651-9108  
mdevine@law.ga.gov

*Attorneys for Plaintiff State of Georgia*

**ANNE E. LOPEZ**

Attorney General  
State of Hawai'i

/s/ Christopher T. Han

Bryan C. Yee (HI JD No. 4050),  
*pro hac vice*  
Supervising Deputy Attorney General  
Christopher T. Han (HI JD No. 11311),  
*pro hac vice*  
Deputy Attorney General  
Department of the Attorney General  
Commerce and Economic Development Division  
425 Queen Street  
Honolulu, Hawai'i 96813  
Phone: (808) 586-1180  
Bryan.c.yee@hawaii.gov  
Christopher.t.han@hawaii.gov

*Attorneys for Plaintiff State of Hawai'i*

**RAÚL R. LABRADOR**

Attorney General  
State of Idaho

/s/ Nathan Nielson

Nathan H. Nielson (ID Bar No. 9234),  
*pro hac vice*  
Deputy Attorney General  
Attorney General's Office  
P.O. Box 83720  
Boise, ID 83720-0010  
(208) 334-2424  
nathan.nielson@ag.idaho.gov

*Attorneys for Plaintiff State of Idaho*

**THEODORE E. ROKITA**

Attorney General  
State of Indiana

/s/ Scott L. Barnhart

Scott L. Barnhart (IN Atty No. 25474-82),  
*pro hac vice*  
Chief Counsel and Director of Consumer  
Protection  
Corinne Gilchrist (IN Atty No. 27115-53),  
*pro hac vice*  
Section Chief, Consumer Litigation  
Mark M. Snodgrass (IN Atty No. 29495-49),  
*pro hac vice*  
Deputy Attorney General  
Office of the Indiana Attorney General  
Indiana Government Center South  
302 West Washington St., 5th Floor  
Indianapolis, IN 46203  
Telephone: (317) 232-6309  
Scott.Barnhart@atg.in.gov  
Corinne.Gilchrist@atg.in.gov  
Mark.Snodgrass@atg.in.gov

*Attorneys for Plaintiff State of Indiana*



**KWAME RAOUL**  
Attorney General  
State of Illinois

/s/ Matthew Davies

Susan Ellis, Chief, Consumer Protection Division  
(IL Bar No. 6256460)  
Greg Grzeskiewicz, Chief, Consumer Fraud  
Bureau (IL Bar No. 6272322)  
Jacob Gilbert, Deputy Chief, Consumer Fraud  
Bureau (IL Bar No. 6306019)  
Adam Sokol, Consumer Counsel, Consumer Fraud  
Bureau (IL Bar No. 6216883)

Matthew Davies, Assistant Attorney General,  
Consumer Fraud Bureau (IL Bar No. 6299608), *pro*  
*hac vice*

Emily Maria Migliore, Assistant Attorney General,  
Consumer Fraud Bureau (IL Bar No. 6336392)  
Kevin Whelan, Assistant Attorney General,  
Consumer Fraud Bureau (IL Bar No. 6321715), *pro*  
*hac vice*

Office of the Illinois Attorney General  
115 S. LaSalle Street  
Chicago, Illinois 60603  
312-814-2218  
Susan.Ellis@ilag.gov  
Greg.Grzeskiewicz@ilag.gov  
Jacob.Gilbert@ilag.gov  
Adam.Sokol@ilag.gov  
Matthew.Davies@ilag.gov  
Emily.Migliore@ilag.gov  
Kevin.Whelan@ilag.gov

*Attorneys for Plaintiff the People of the State of  
Illinois*

**KRIS W. KOBACH**  
Attorney General  
State of Kansas

/s/ Sarah M. Dietz

Sarah Dietz, Assistant Attorney General  
(KS Bar No. 27457), *pro hac vice*  
Office of the Kansas Attorney General  
120 SW 10th Avenue, 2nd Floor  
Topeka, Kansas 66612  
Telephone: (785) 296-3751  
sarah.dietz@ag.ks.gov

*Attorney for Plaintiff State of Kansas*

**LIZ MURRILL**  
Attorney General  
State of Louisiana

/s/ Asyl Nachabe

Asyl Nachabe (LA Bar No. 38846),  
*pro hac vice*  
L. Christopher Styron (LA Bar No. 30747),  
*pro hac vice*  
Assistant Attorneys General  
Louisiana Department of Justice  
Office of the Attorney General  
Public Protection Division  
Consumer Protection Section  
1885 N 3<sup>rd</sup> Street, 4<sup>th</sup> Floor  
Baton Rouge, LA 70802  
Tel: (225) 326-6438  
NachabeA@ag.louisiana.gov  
StyronC@ag.louisiana.gov

*Attorneys for State of Louisiana*

**RUSSELL COLEMAN**

Attorney General  
Commonwealth of Kentucky

/s/ J. Christian Lewis

J. Christian Lewis (KY Bar No. 87109),  
*pro hac vice*

Philip Heleringer (KY Bar No. 96748),  
*pro hac vice*

Zachary Richards (KY Bar No. 99209),  
*pro hac vice*

Daniel I. Keiser (KY Bar No. 100264),  
*pro hac vice*

Matthew Cocanougher (KY Bar No. 94292), *pro*  
*hac vice*

Assistant Attorneys General  
1024 Capital Center Drive, Ste. 200  
Frankfort, KY 40601

Christian.Lewis@ky.gov

Philip.Heleringer@ky.gov

Greg.Ladd@ky.gov

[Zach.Richards@ky.gov](mailto:Zach.Richards@ky.gov)

Daniel.Keiser@ky.gov

Matthew.Cocanougher@ky.gov

Phone: (502) 696-5300

Fax: (502) 564-2698

*Attorneys for Plaintiff the Commonwealth of  
Kentucky*

**AARON M. FREY**

Attorney General  
State of Maine

/s/ Michael Devine

Michael Devine, Maine Bar No. 5048,  
*pro hac vice*

Assistant Attorney General  
Office of the Maine Attorney General

6 State House Station

Augusta, ME 04333

(207) 626-8829

michael.devine@maine.gov

*Attorney for Plaintiff State of Maine*

**KEITH ELLISON**

Attorney General  
State of Minnesota

/s/ Caitlin Micko

Caitlin Micko (MN Bar No. 0395388)

*pro hac vice*

Assistant Attorney General  
Office of the Minnesota Attorney General

445 Minnesota Street, Suite 1200

St. Paul, MN 55101-2130

Tel: (651) 724-9180

[caitlin.micko@ag.state.mn.us](mailto:caitlin.micko@ag.state.mn.us)

*Attorney for Plaintiff State of Minnesota, by its  
Attorney General, Keith Ellison*

**ANTHONY G. BROWN**

Attorney General  
State of Maryland

/s/ Elizabeth J. Stern

Philip D. Ziperman (Maryland CPF No.  
9012190379), *pro hac vice*  
Deputy Chief, Consumer Protection Division  
Elizabeth J. Stern (Maryland CPF No.  
1112090003), *pro hac vice*  
Assistant Attorney General  
Office of the Attorney General of Maryland  
200 St. Paul Place  
Baltimore, MD 21202  
Phone: (410) 576-6417 (Mr. Ziperman)  
Phone: (410) 576-7226 (Ms. Stern)  
Fax: (410) 576-6566  
pziperman@oag.state.md.us  
estern@oag.state.md.us

*Attorneys for Plaintiff Office of the Attorney  
General of Maryland*

**DANA NESSEL**

Attorney General  
State of Michigan

/s/ Daniel J. Ping

Daniel J. Ping (P81482), *pro hac vice*  
Assistant Attorney General  
Michigan Department of Attorney General  
Corporate Oversight Division  
P.O. Box 30736  
Lansing, MI 48909  
517-335-7632  
PingD@michigan.gov

*Attorneys for Plaintiff State of Michigan*

**ANDREW BAILEY**

Attorney General  
State of Missouri

/s/ Michael Schwalbert

Michael Schwalbert, *pro hac vice*  
Assistant Attorney General  
Consumer Protection Section  
Missouri Attorney General's Office  
815 Olive Street | Suite 200  
Saint Louis, Missouri 63101  
michael.schwalbert@ago.mo.gov  
Phone: 314-340-7888  
Fax: 314-340-7981

*Attorney for Plaintiff State of Missouri, ex rel.  
Andrew Bailey, Attorney General*

**AUSTIN KNUDSEN**

Attorney General  
State of Montana

/s/ Anna K. Schneider

Anna K. Schneider  
Montana Attorney General's Office  
Special Assistant Attorney General  
Senior Counsel  
Office of Consumer Protection  
P.O. Box 201405  
Helena, MT 59620-1405  
(406) 444-4500  
anna.schneider@mt.gov

David H. Thompson, *pro hac vice*  
Michael W. Kirk, *pro hac vice*  
Brian W. Barnes, *pro hac vice*  
Megan M. Wold, *pro hac vice*  
Athanasia O. Livas, *pro hac vice*  
Cooper & Kirk, PLLC  
1523 New Hampshire Ave., N.W.  
Washington, D.C. 20036  
Tel: (202) 220-9600  
Fax: (202) 220-9601  
dthompson@cooperkirk.com

*Council for Plaintiff, State of Montana*

**MICHAEL T. HILGERS**

Attorney General  
State of Nebraska

/s/ Colin P. Snider

Colin P. Snider (NE #27724)  
Assistant Attorney General  
*pro hac vice*  
Nebraska Attorney General's Office  
2115 State Capitol Building  
Lincoln, NE 68509  
Phone: (402) 471-3840  
Email: michaela.hohwieler@nebraska.gov  
Email: colin.snider@nebraska.gov

*Attorneys for Plaintiff State of Nebraska*

**MATTHEW J. PLATKIN**

Attorney General  
State of New Jersey

/s/ Kashif T. Chand

Kashif T. Chand (NJ Bar No. 016752008),  
*pro hac vice*  
Section Chief, Deputy Attorney General  
New Jersey Office of the Attorney General,  
Division of Law  
124 Halsey Street, 5th Floor  
Newark, NJ 07101  
Tel: (973) 648-2052  
Kashif.Chand@law.njoag.gov

*Attorney for Plaintiffs Matthew J. Platkin, Attorney General for the State of New Jersey, and Cari Fais, Acting Director of the New Jersey Division of Consumer Affairs*

**LETITIA JAMES**

Attorney General  
State of New York

/s/ Christopher D'Angelo

Christopher D'Angelo, Chief Deputy Attorney General, Economic Justice Division (NY Bar No. 4348744), *pro hac vice*  
Christopher.D'Angelo@ag.ny.gov  
Clark Russell, Deputy Chief, Bureau of Internet and Technology (NY Bar No. 2848323), *pro hac vice*  
Clark.Russell@ag.ny.gov  
Nathaniel Kosslyn, Assistant Attorney General (NY Bar No. 5773676), *pro hac vice*  
Nathaniel.Kosslyn@ag.ny.gov  
New York State Office of the Attorney General  
28 Liberty Street  
New York, NY 10005  
(212) 416-8262

*Attorneys for Plaintiff the People of the State of New York*

**JOSHUA H. STEIN**

Attorney General  
State of North Carolina

/s/ Kevin Anderson

Kevin Anderson (N.C. Bar No. 22635),  
*pro hac vice*  
Senior Counsel for Consumer Protection and  
Multistate Litigation  
Sarah G. Boyce  
Deputy Attorney General & General Counsel  
Jasmine S. McGhee  
Senior Deputy Attorney General  
Director, Consumer Protection Division  
Josh Abram  
Kunal Choksi  
Special Deputy Attorneys General  
Charles G. White  
Assistant Attorney General  
N.C. Department of Justice  
Post Office Box 629  
Raleigh, North Carolina 27602  
Telephone: (919) 716-6006  
Facsimile: (919) 716-6050  
kander@ncdoj.gov

*Attorneys for Plaintiff State of North Carolina*

**DAVE YOST**

Attorney General  
State of Ohio

/s/ Kevin R. Walsh

Melissa G. Wright (Ohio Bar No. 0077843)  
Section Chief, Consumer Protection Section  
Melissa.Wright@ohioago.gov  
Melissa S. Smith (Ohio Bar No. 0083551)  
Asst. Section Chief, Consumer Protection  
Section  
Melissa.S.Smith@ohioago.gov  
Michael S. Ziegler (Ohio Bar No. 0042206)  
Principal Assistant Attorney General  
Michael.Ziegler@ohioago.gov  
Kevin R. Walsh (Ohio Bar No. 0073999),  
*pro hac vice*  
Kevin.Walsh@ohioago.gov  
Senior Assistant Attorney General  
30 East Broad Street, 14<sup>th</sup> Floor  
Columbus, Ohio 43215  
Tel: 614-466-1031

*Attorneys for State of Ohio, ex rel. Attorney  
General Dave Yost*

**ELLEN F. ROSENBLUM**

Attorney General  
State of Oregon

/s/ Jordan M. Roberts

Jordan M. Roberts (Oregon Bar No. 115010),  
*pro hac vice*  
Assistant Attorney General  
Oregon Department of Justice  
Consumer Protection Section  
100 SW Market Street  
Portland, Oregon 97201  
Telephone: (971) 673-1880  
Facsimile: (971) 673-1884  
E-mail: jordan.m.roberts@doj.state.or.us

*Attorneys for State of Oregon, ex rel. Ellen  
F. Rosenblum, Attorney General for the  
State of Oregon*

**DREW H. WRIGLEY**

Attorney General  
State of North Dakota

/s/ Elin S. Alm

Elin S. Alm, *pro hac vice*  
(ND Bar No. 05924)  
Director/Assistant Attorney General  
Christopher G. Lindblad, *pro hac vice*  
(ND Bar No. 06480)  
Assistant Attorney General  
Consumer Protection and Antitrust Division  
Office of Attorney General  
1720 Burlington Drive, Suite C  
Bismarck, ND 58504-7736  
Telephone (701) 328-5570  
[ecalm@nd.gov](mailto:ecalm@nd.gov)

[clindblad@nd.gov](mailto:clindblad@nd.gov)

*Attorneys for Plaintiff State of North Dakota, ex rel.*  
*Drew H. Wrigley, Attorney General*

**MICHELLE A. HENRY**

Attorney General  
Commonwealth of Pennsylvania

/s/ Timothy R. Murphy

Timothy R. Murphy  
Senior Deputy Attorney General  
(PA Bar No. 321294), *pro hac vice*  
Email: [tmurphy@attorneygeneral.gov](mailto:tmurphy@attorneygeneral.gov)  
Jonathan R. Burns  
Deputy Attorney General  
(PA Bar No. 315206), *pro hac vice*  
Email: [jburns@attorneygeneral.gov](mailto:jburns@attorneygeneral.gov)  
Pennsylvania Office of Attorney General  
Strawberry Square, 14<sup>th</sup> Floor  
Harrisburg, PA 17120  
Tel: 717.787.4530

*Attorneys for Plaintiff the Commonwealth of*  
*Pennsylvania*

**ALAN WILSON**

Attorney General  
State of South Carolina

/s/ Anna C. Smith

C. Havird Jones, Jr.  
Senior Assistant Deputy Attorney General  
Jared Q. Libet (S.C. Bar No. 74975),  
*pro hac vice*  
Assistant Deputy Attorney General  
Anna C. Smith (SC Bar No. 104749),  
*pro hac vice*  
Assistant Attorney General  
Clark C. Kirkland, Jr. (CA SBN 272522)  
Assistant Attorney General  
**OFFICE OF THE ATTORNEY**  
**GENERAL OF SOUTH CAROLINA**  
P.O. Box 11549  
Columbia, South Carolina 29211  
Tel: (803) 734-0536  
[annasmith@scag.gov](mailto:annasmith@scag.gov)

*Attorneys for Plaintiff the State of South*  
*Carolina, ex rel. Alan M. Wilson, in His*  
*Official Capacity as*  
*Attorney General of the State of South*  
*Carolina*

**MARTY J. JACKLEY**

Attorney General  
State of South Dakota

/s/ Jessica M. LaMie

By: Jessica M. LaMie (SD Bar No. 4831),  
*pro hac vice*  
Assistant Attorney General  
1302 East Highway 14, Suite 1  
Pierre, SD 57501-8501  
Telephone: (605) 773-3215  
[Jessica.LaMie@state.sd.us](mailto:Jessica.LaMie@state.sd.us)

*Attorneys for Plaintiff State of South Dakota*

**PETER F. NERONHA**

Attorney General  
State of Rhode Island

/s/ Stephen N. Provazza

Stephen N. Provazza (R.I. Bar No. 10435),  
*pro hac vice*  
Assistant Attorney General  
Rhode Island Office of the Attorney General  
150 South Main St.  
Providence, RI 02903  
Phone: 401-274-4400  
Email: SProvazza@riag.ri.gov

*Attorneys for Plaintiff State of Rhode Island*

**JASON S. MIYARES**

Attorney General  
Commonwealth Of Virginia

/s/ Joelle E. Gotwals

Steven G. Popps  
Chief Deputy Attorney General  
Thomas J. Sanford  
Deputy Attorney General  
Richard S. Schweiker, Jr.  
Senior Assistant Attorney General and Section  
Chief  
Joelle E. Gotwals (VSB No. 76779),  
*pro hac vice*  
Assistant Attorney General  
Office of the Attorney General of Virginia  
Consumer Protection Section  
202 N. 9th Street  
Richmond, Virginia 23219  
Telephone: (804) 786-8789  
Facsimile: (804) 786-0122  
E-mail: jgotwals@oag.state.va.us

*Attorneys for the Plaintiff Commonwealth of  
Virginia  
ex rel. Jason S. Miyares, Attorney General*

**PATRICK MORRISEY**

Attorney General  
State of West Virginia

/s/ Laurel K. Lackey

Laurel K. Lackey (WVSB No. 10267),  
*pro hac vice*  
Abby G. Cunningham (WVSB No. 13388)  
Assistant Attorneys General  
Office of the Attorney General  
Consumer Protection & Antitrust Division  
Eastern Panhandle Office  
269 Aikens Center  
Martinsburg, West Virginia 25404  
(304) 267-0239  
laurel.k.lackey@wvago.gov

*Attorneys for Plaintiff State of West Virginia,  
ex rel. Patrick Morrissey, Attorney General*

**JOSHUA L. KAUL**

Attorney General  
State of Wisconsin

/s/ Colin R. Stroud

Colin R. Stroud  
Assistant Attorney General  
WI State Bar #1119457, *pro hac vice*  
Wisconsin Department of Justice  
Post Office Box 7857  
Madison, Wisconsin 53707-7857  
(608) 261-9224  
stroudcr@doj.state.wi.us

*Attorneys for Plaintiff State of Wisconsin*



**ROBERT W. FERGUSON**

Attorney General  
State of Washington

/s/ Alexandra Kory

Alexandra Kory (WA Bar No. 49889),  
*pro hac vice*

Joseph Kanada (WA Bar No. 55055),  
*pro hac vice*

Rabi Lahiri

Gardner Reed

Assistant Attorneys General

Washington State Office of the Attorney  
General

800 Fifth Avenue, Suite 2000

Seattle, WA 98104

(206) 389-3843

Alexandra.Kory@atg.wa.gov

*Attorneys for Plaintiff State of Washington*